

From:
To: [Site Allocations Plan](#)
Cc:
Subject: PDE00799_Horsforth Housing response HG2-41 & HG2-43
Date: 03 November 2015 15:26:16

Dear Sir / Madam

I object to the use of Greenbelt land at site HG2-41 and playing fields at HG2-43 being allocated for housing use and do not consider the SAP to be sound for the reasons outlined below. I would like to be kept apprised of progress on this and the dates for any further consultation, submissions and Public Inquiry. I reserve my right to state my case either in writing and verbally at any such Public Inquiry.

HG2-41 (land south of A65)

Two benefits are highlighted as part of the delivery of this site in order to help mitigate the existing infrastructure deficits, however it is not clear and no evidence is provided of how these might be delivered, the environmental impacts and whether they are actually feasible or have a sound business case. It is therefore difficult to use these as justification for the significant incursion into the Green belt

1. Provision of new school –
 - a. How will this be accommodated on sloping site and whereabouts within the site? It is going to be very difficult, expensive and environmentally damaging to provide the footprint needed for a through school – has any of this been considered?
 - b. Has the additional traffic impact of a new 1620 place school been modelled within the transport models – what is the impact on local congestion?
 - c. The new school is likely to have a limited walk catchment to existing Horsforth areas, resulting in lots of driving to the site
2. Provision of airport link road
 - a. This currently has no planning status and itself requires vast swathes of Greenbelt – little or no weight can be placed on its implementation
 - b. The provision of a new junction on the A65 to the airport link road and housing development is not straight forward due to a likely off set between the two and significant level changes on both sides. Any such layout would be very land hungry requiring extensive engineering works in the form of embankments, retaining structures and cuttings. What design work has been undertaken – how feasible (and how acceptable are the impacts) of the ALR.
 - c. The widening of the A65 to facilitate bus priority (which must be an absolute requirement of any such allocation) is constrained by
 - i. Two private dwellings – is the Council proposing to use CPO powers to acquire land? The housing developer certainly won't want to get involved with third party land
 - ii. Steep gradients to both sides of the A65
 - iii. In excess of 50 mature trees
 - d. No preliminary design of the Airport Link Road, junction with the A65 or widening of the A65 has been publically consulted on. It's engineering feasibility and environmental credibility must be called into question

Other issues are:

1. Significant Environmental impacts – there has been no Environmental Impact Assessment undertaken of the proposals. Of particular concern are:
 - a. Loss of landscape and ecological habitats
 - b. Visual intrusion across an important and locally defining view of the Aire Valley
 - c. Air quality and noise impacts
 - d. Additional congestion
 - e. Economic impacts on the local economy
2. No supporting information on form or layout of supporting highway infrastructure, or the required landtake of these – see comments above. In any event, inbound capacity cannot be increased through Horsforth New Road Side (due to building constraints), or the Ring Road in either direction due to physical constraints (railway, canal & river bridges to the south, and jct of Broadway with Fink Hill to the east).
3. Lack of consultation before this final stage of consultation. The site has not been incorporated in any previous Core Strategy or Site Allocations documents. I therefore question the appropriateness and soundness of doing so at this late stage when no alternative sites are provided.
4. Would there be any access onto Calverley Lane – this would not be acceptable due to a very poor junction with the Ring Road
5. The current improvements to Horsforth and Rodley roundabouts are designed to accommodate existing traffic congestion and extant development permission, and would likely be inadequate to cope with additional demand from new housing allocations as conceded in the supporting Infrastructure documents produced by LCC Highways. What additional capacity improvements would be provided here, particularly taking into account the points made at no. 2 above.

Based on the above and lack of information provided / lack of assessment undertaken I must conclude that the proposals are contrary to national policy and the National Planning Policy Framework in terms of:

- Impact on Greenbelt – there has been no comprehensive review of Greenbelt in Leeds as required by the Inspector overseeing the Core Strategy inquiry.
- Lack of associated infrastructure proposals and resultant congestion, reduction in air quality and impact on health and impact on local economy
- Lack of consultation on these sites and no alternatives offered at this late stage – I therefore question the legal compliance
- Doubts over the deliverability of the sites, given the reliance on infrastructure measures which are doubtful at best

HG2-43 Horsforth Campus

In terms of site HG2.43 at the Park Lane college site, I am supportive of new houses on the brownfield element of the site and while a preference would be to leave the fields alone I accept that Horsforth must take its fair share of housing and therefore building on these fields may be acceptable. Without adequate infrastructure in place however I would only support development on this site that generated traffic up to the levels produced by the college. Without this express restriction on development I would object to the allocation of the fields.

I trust these comments will be taken into account in consideration of the final Site Allocations

Plan

Many thanks
Nathan

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3rd November 2015